

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 3:18 CR 30172 NJR
vs.)	
)	
JACE A. FAUGNO,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO CONTINUE SENTENCING

COMES NOW Defendant Jace Faugno, by and through his attorney, Mark A. Hammer (“counsel”), and respectfully requests a continuance of his sentencing currently scheduled for February 25, 2020 at 10:30 to March 30, 2020 at 1:30 pm. This motion is made on the following grounds:

- 1) During the lengthy duration of Defendant’s pretrial release, he was required to attend Professional Psychotherapy Services (“PPS”) for issue-specific counseling. Counsel has learned from PPS that, pursuant to its contract with Pretrial Services, information concerning client’s participation, commitment to counseling and amenability to treatment is not typically released at the request of either party. Counsel and AUSA Christopher Hoell are currently communicating with Pretrial Services concerning this restriction and whether there is some way to release these documents for consideration by the Court without a separate Court order.
- 2) Once the PPS records are hopefully received, Counsel requires additional time to submit Defendant’s sentencing memorandum to the Court addressing Defendant’s counseling efforts and other information relevant to the Court’s consideration under 18 USC

§3553(a). Counsel is also still considering whether to file objections to the final Presentence Investigation Report and requires additional time for that purpose.

3) Counsel has spoken to AUSA Hoell who has *no objection* to the proposed continuance.

After comparing conflicts in their respective schedules, and in consideration of the Court's schedule, the parties are asking that the case be continued to March 30, 2020 at 1:30 pm.

Respectfully submitted,

/s/ Mark A. Hammer

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CERTIFICATE OF SERVICE

I certify that, on February 14, 2020, a copy of this document was electronically filed with the Clerk of Court, and served on all counsel of record, by the CM-ECF system.

/s/ Mark A. Hammer
